

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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MARIA PIZARRO,

Plaintiff/Counter Defendant,

Case No.: 20-cv-5783 (AKH)

-against-

**NOTICE OF MOTION**

EUROS EL TINA RESTAURANT LOUNGE AND  
BILLIARDS CORP. et al,

Defendants/Counterclaimants/Third Party Plaintiffs,

-against-

JOSE E CASTRO et al,

Third Party Defendants/Counter Defendants

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**PLEASE TAKE NOTICE** that upon the accompanying Memorandum of Law, Rule 56.1 Statement of Material Facts, and Affirmation of Jesse C. Rose, dated April 27, 2024, the undersigned, on behalf of Third Party Defendants/Counter Defendants Jose Castro and Eladio Castro Productions Inc. will move this Court at the United States District Court, Southern District of New York, 500 Pearl Street, New York New York 1007, on a date and time to be assigned by the Court for an Order (1) pursuant to FRCP 56 awarding Judgment as a Matter of Law dismissing the claims asserted by Defendants/Counterclaimants/Third Party Plaintiffs against the movant, and (2) pursuant to FRCP 11 for sanctions against Defendants' counsel for pursuing known frivolous claims even after being served with a safe harbor letter, along with what just and further relief the Court deems appropriate.

Dated: Astoria, New York  
April 17, 2024

**THE ROSE LAW GROUP PLLC**

/s/Jesse C. Rose  
Jesse C. Rose, Esq.  
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